

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TENNESSEE  
AT KNOXVILLE**

**ANDREW JOSTEN LOVINGOOD,**

Plaintiff,

v.

**No. 3:19-cv-00009**

**BILL JOHNSON, DERRICK GRAVES;**

Defendants.

**MEMORANDUM IN SUPPORT OF MOTION IN LIMINE NO. 2**

This case was filed January 5, 2019. It was previously filed in federal district court and voluntarily dismissed without prejudice. In the interim, Mr. Lovingood sought to impose criminal liability upon this Defendant and the same was rejected by a jury in the criminal court for Monroe County, Tennessee and Defendant Johnson was acquitted.

Now, Plaintiff has refiled his federal district court complaint and outline various numbers he attributes to certain medical institutions. The same have never been produced and Plaintiff totally failed to disclose the same appropriately under Fed. Rule Civ. Pro. 26. Instead, Plaintiff has done nothing but place the same in his exhibit list and pretrial order.

Accordingly, it is respectfully submitted that Defendant's Motion in Limine No. 2 be granted.

RESPECTFULLY SUBMITTED this 15<sup>th</sup> day of November, 2021.

s/ Arthur F. Knight, III  
Arthur F. Knight, III, BPR #016178  
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**CERTIFICATE OF SERVICE**

I hereby certify that on November 15, 2021, a copy of the foregoing was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by U.S. Mail. Parties may access this filing through the Court's electronic filing system.

s/Arthur F. Knight, III  
Arthur F. Knight, III